

2. For each person identified in your response to each subpart of Interrogatory #1, please state and describe with specificity what knowledge each individual possesses.



3. For each person identified in your response to each subpart of Interrogatory #1, please state and describe with specificity what contact Defendants, through their representatives, employees, agents, independent contractors, insurers, and/or attorneys have had with him or her pertaining to the Plaintiff's claims and/or the instant lawsuit.

4. Please describe in detail any internal investigations that were conducted by Defendants regarding Plaintiff's allegations that Sylvester Cuyler was either:

- allowing mismatches in amateur mixed martial arts ("MMA") contests;
- allowing a professional MMA participant to fight an amateur;
- failing to suspend a combatant who tested non-negative for HIV;
- accepting a CT Scan that revealed marked brain impairment;
- (e) allowing amateur promoters to deviate from sanction protocols;
- (f) accepting medical submissions over the objections of commission physicians;
- allowing promoters to "shop" for medical doctors' approvals;
- (h) allowing MMA promoters to deviate from sanction protocols;
- (i) failing to collect the James Toney Bout Agreement;
- (j) permitting a combatant to compete who did not attend a weigh-in ceremony;
- allowing urine samples to sit in unsecured refrigerators;
- (l) permitting contestants to participate without submitting required medical documents;
- unilaterally reducing medical suspensions without consulting physicians and/or conducting post-fight testing;

issuing licenses to unidentified individuals;

allowing promoters to ignore their obligations regarding the payment

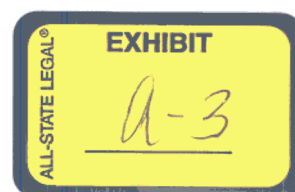
of checks and the payment of ringside officials; or

(p) mismanaging the implementation of a medical database.

5. Please identify any and all officers, agents or employees of Defendants who participated in the decision to terminate Plaintiff's employment. For each individual identified, please set forth in detail their involvement.

6. Identify the work duties and/or responsibilities of Plaintiff's position of employment.

7. Please set forth with specificity the reasons for Plaintiff's termination.



8. Please describe in detail any and all communications by, among or between any officers or agents of Defendants relative to the decision to terminate Plaintiff's employment. Please also identify any documents associated with said communications.

9. Identify each person who has been contacted by you as a fact witness, set forth the facts and circumstances known by that person, and identify each statement obtained from that person.

10. Please identify all witnesses you intend to call at trial and provide a summary of each witness' anticipated testimony.

11. Identify all documents and/or individuals consulted in preparing your responses to Plaintiff's First Set of Interrogatories.

SIDNEY L. GOLD & ASSOCIATES, P.C.

By: 

TRACI M. GREENBERG, ESQUIRE
1835 Market Street
Philadelphia, PA 19103
(215) 569-1999
Attorneys for Plaintiff

Date: March 20, 2008


CERTIFICATE OF SERVICE

I hereby certify that on this date I caused a true and correct copy of **Plaintiff's First Set of Interrogatories Addressed to Defendants State Athletic Control Board of the State of New Jersey and Office of Attorney General of the State of New Jersey**, to be served by United States Mail, First Class Service, properly addressed and postage prepaid, upon the following:

Noreen P. Kemether, Esquire
Deputy Attorney General
State of New Jersey -Division of Law
R.J. Hughes Justice Complex
25 Market Street
P.O. Box 112
Trenton, New Jersey 08625

SIDNEY L. GOLD & ASSOCIATES, P.C.

By: _____


TRACI M. GREENBERG, ESQUIRE
Attorney's for Plaintiff

Dated: March 20, 2008